

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Anthony Hayes
Debtor 1
Jennifer Rhee Hayes
Debtor 2

Chapter 13

Case No. 1:18-BK-00124-HWV

Matter: Motion for Termination of Wage Attachment Order

MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER

AND NOW, come the Debtor(s), Anthony Hayes and Jennifer Rhee Hayes, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about January 15, 2018.
- 2) Debtor 1 receives regular income from employment with Ventura Foods, LLC which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Chapter 13 Trustee.

Respectfully submitted,

Date: January 7, 2021

/s/ Anthony Hayes

Debtor 1

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should immediately cease the wage attachment in the amount of **\$520.15** from each **bi-weekly** paycheck.

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, January 7, 2021, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail
Ventura Foods, LLC
Attn: Payroll Administrator
1501 Orchard Drive
Chambersburg, PA 17201

Via Electronic Means
Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire